- 1			
1 2	Muriel B. Kaplan, Esq. (SBN 124607) Michele R. Stafford, Esq. (SBN 172509) SALTZMAN & JOHNSON LAW CORPORATION		
3	44 Montgomery St., Suite 2110 San Francisco, CA 94104		
4	(415) 882-7900 (415) 882-9287–Facsimile		
-	mkaplan@sjlawcorp.com		
5	mstafford@sjlawcorp.com		
6	Attorneys for Plaintiffs		
7			
8	UNITED STATES DISTRICT COURT		
9	FOR THE NORTHERN DISTRICT OF CALIFORNIA		
10	NORTHERN CALIFORNIA GLAZIERS,	Case No.: C08-1725 SC	
11	ARCHITECTURAL METAL AND GLASS		
12	WORKERS PENSION PLAN, et al.	REQUEST FOR CONTINUANCE OF CASE MANAGEMENT CONFERENCE	
13	Plaintiffs,		
14	V.	Date: July 11, 2008 Time: 10:30 a.m.	
15	KELLY RAYMOND PLEDGER, Individually,	Ctrm: 1, 17 th Floor	
	and dba PLEDGER GLASS,	Judge: The Honorable Samuel Conti	
16	Defendant.		
17		1	
18	Plaintiffs herein respectfully request a Co	ontinuance of the Case Management Conference	
19	currently on calendar for July 11, 2008, for approximately 60 days,		
20		2008, is being submitted now as the undersigned	
21	will be out of the office between June 28, 2008 and July 9, 2008. 2. Defendant's default was entered on May 1, 2008. Thereafter, a question arose as to the status of defendant and his business. Inquiry was made, and the matter was recently clarified. 3. Plaintiffs will now attempt to contact defendant to inquire as to stipulating to judgment for payment, and to providing the documents required for an audit to determine an		
22			
23			
24			
25			
26			
27	further amounts due. Should those negotiations	prove unfruitful, plaintiffs will file a Motion for	
-	Default Judgment. There are therefore no issues t	o address at a Case Management Conference.	

REQUEST FOR CONTINUANCE OF CASE MANAGEMENT CONFERENCE

Case No.: C08-1725 SC

P:\CLIENTS\GLACL\Pledger Glass\Pleadings\C08-1725 SC CMC Continuance Request 062708.DOC

28

1	4. Plaintiffs therefore respectfully request that the Case Management Conference,		
2	currently scheduled for July 11, 2008 be continued for approximately 60 days to allow plaintiffs to		
3	inquire about the possibility of settlement, and if not, to prepare and file a Motion for Default		
4	Judgment.		
5	5. It is furthermore requested that all previously set deadlines and dates related to this		
6	case be continued as well.		
7	I declare under penalty of perjury that I am the attorney for the plaintiffs in the above		
8	entitled action, and that the foregoing is true of my own knowledge.		
9	Executed this 27 th day of June, 2008, at San Francisco, California.		
10	SALTZMAN & JOHNSON		
11	LAW CORPORATION		
12	By:		
13	Muriel B. Kaplan		
14	Attorneys for Plaintiffs		
15			
16	IT IS SO ORDERED.		
17			
18	The currently set Case Management Conference is hereby continued to at, and all previously set deadlines and		
19	dates related to this case are vacated, to be reset at that Conference.		
20	Dated:		
21	THE HONORABLE SAMUEL CONTI		
22			
23			
24			
25			
26			
27			
28	-2-		

PROOF OF SERVICE

I, the undersigned, declare:

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

I am a citizen of the United States and am employed in the County of San Francisco, State of California. I am over the age of eighteen and not a party to this action. My business address is 44 Montgomery Street, Suite 2110, San Francisco, California 94104.

On June 27, 2008, I served the following document(s):

REQUEST FOR CONTINUANCE OF CASE MANAGEMENT CONFERENCE

on the interested parties in said action by placing a true and exact copy of each document in a sealed envelope with postage thereon fully prepaid, in a United States Post Office box in San Francisco, California, addressed as follows:

> **Kelly Raymond Pledger** dba Pledger Glass 708 St. Andrews Drive Vacaville, California 95687

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on this 27th day of June, 2008, at San Francisco, California.

/s/_			
Vanessa de Fábrega			

26

27

28